SERVE: USAA Casualty Insurance Company, Uninsured/Underinsured Motorist Carrier: c/o Commissioner of Insurance, 500 J. Robertson Parkway, 5th Floor, Nashville, Tennessee 37243.

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

STEVEN WOOTEN,	
Plaintiff,	Civil Action No 2-102-23
VS.)
BRYAN TEJEDA,) JURY TRIAL DEMANDED) \
A & M TRANSPORTATION SERVICE GROUP, INC., and Serve: Guillermo Garcia, Registered Agent 78 S.W. 7th St., 5th Floor Miami, FL 33130	CHARLE 2022 AP KNOX AND J
FEDEX CORPORATION,	UVE SEPTI
Serve: C.T. Corporation System, Registered Agent 300 Montvue Rd. Knoxville, TN 37919-5546	ED SUSANO I
Defendants.	75 77 23 =

COMPLAINT

Comes now the Plaintiff, Steven Wooten, by and through counsel, for his cause of action against the Defendants, Bryan Tejeda, A&M Transportation Service Group, Inc., and FedEx Corporation, and would respectfully show unto this Honorable Court:

- 1. On or about April 15, 2021, the Plaintiff, Steven Wooten, was operating a vehicle traveling eastbound on Interstate 640 in Knox County, Tennessee.
- 2. On or about April 15, 2021, the Defendant, Bryan Tejeda, was operating a vehicle travelling eastbound on Interstate 640 in Knox County, Tennessee. At all times material herein, the Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, were the owners of said vehicle.
- 3. While operating the vehicle in question, the Defendant, Bryan Tejeda, was employed by the Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, and was engaged in the ordinary course of business.
- 4. The Defendant, Bryan Tejeda, changed lanes in his vehicle without keeping a proper lookout and collided with the Plaintiff's vehicle.

- 5. The Defendant, Bryan Tejeda, was negligent in failing to exercise due care in violation of Tenn. Code Ann. \$ 55-8-136.
- 6. The Defendant, Bryan Tejeda, was negligent in moving into an adjoining lane without ascertaining that such a maneuver could be made safely, in violation of Tenn. Code Ann. § 55-8-143.
- 7. The Defendant, Bryan Tejeda, was negligent in turning without ascertaining that such a maneuver could be made with reasonable safety in violation of Tenn. Code Ann. \$ 55-8-142.
- 8. The Defendant, Bryan Tejeda, was negligent in failing to maintain the vehicle he was operating under due and reasonable control.
- 9. The Defendant, Bryan Tejeda, was negligent in failing to maintain a due and proper look out ahead in the direction in which he was driving.
- 10. The Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, were negligent in entrusting the vehicle at issue to the Defendant, Bryan Tejeda.
- ll. The negligence of all Defendants was the sole cause of the collision.
- 12. The Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, are responsible for any negligence of the Defendant, Bryan Tejeda, through the doctrine of *respondeat superior*.
- 13. As a result of the collision, the Plaintiff, Steven Wooten, suffered injury.
- 14. As a consequence of these injuries, the Plaintiff, Steven Wooten, incurred expenses for his medical care and treatment, suffered pain of mind and body, and has been prevented from transacting his business.

WHEREFORE, the Plaintiff, Steven Wooten, demands judgment against the Defendants for damages in the sum of ONE-HUNDRED THOUSAND (\$100,000.00) DOLLARS and costs.

The Plaintiff demands a jury try this action.

Respectfully submitted this the <u>12</u> day of April, 2022.

T. SCOTT JONES, BPR #014628
CHRIS W. BEAVERS, BPR #025259
Attorneys for the Plaintiff
BANKS & JONES
2125 Middlebrook Pike
Knoxville, Tennessee 37921
(865) 546-2141
tscottjones@banksandjones.com
chrisbeavers@banksandjones.com

COST BOND

We, the undersigned, do hereby acknowledge ourselves as surety for all of the costs of this cause.

This the 12 day of April, 2022.

Steven Wooten, Principal

T. Scott Jones, Attorney BANKS & JONES, Surety

T. Scott Jones, Attorney

STATE OF TENNESSEE THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

STEVEN WOOTEN, Plaint	ett.)	• .
VS.) Civil	Action No. 2-102-23
BRYAN TEJEDA, A & N and FEDEX CORPORA Defend	•	SERVICE GROUP, IN) (IC.,))	
To the above named defendant	(s):			
Acopy of the answer to the compla A copy of the answer must be fagainst you for the relief demar Issued and attest CERTIFIE To the defendant (s) Tennessée law provides a Tentered against you in this actithe clerk of the court. The list r final, it will not be effective as to be listed; these include items portraits, the family bible, and	int herewith served upon you with the court either before conded in the complaint. THESTIZ day of Operation of the complaint. THESTIZ day of Operation of the complaint. THESTIZ day of Operation of the court of	hin 30 days after service of to within a reasonable time a NOTICE all property exemption from y as exempt, you must file a see changed by you thereafter ssued prior to the filing of the yourself and your family and items be seized you would	execution or seizure to sa written list, under oath, or as necessary; however, under list. Certain items are as d trunks or other receptace	tisfy a judgment. If a judgment should be the tier is filed before the judgment becomes utomatically exempt by law and do not need les necessary to contain such apparel, family hem. If you do not understand your
. 0	,	SERVICE INFORMAT	ΓΙΟΝ	
To the process server: Defer			GROUP, INC.	
can be served at:				ADA FOR ASSISTANCE CALL
v . 1.1.	.1	RETURN		865 / 215-3641
	n the day of			abeth.Golem@knoxcounty.org
	that on the day of			
[] served this summons a	and complaint on the defend	lantin	the following manner	:
[] failed to serve this sun	nmons within 90 days after i	its issuance because:		-
Process Server	Print Name	Address	·	Phone Number

		ATE OF TENN Γ COURT FOR	ESSEE CHA	ARLES DISUSANO PR 12 PM 0	
	S	SUMMO	NS ZOZZA	PR 12 PM 3:23	(II)
STEVEN WOOTEN, Plaintiff, vs.				OUNTY CIRCLING COURTS	1-102-77
BRYAN TEJEDA, A & M TRAN and FEDEX CORPORATION, Defendants.	SPORTATION SER	VICE GROUP,	INC.,)	COURTS	
To the above named defendant (s):					
You are hereby summoned and required to 37921 an answer to the complaint herewith A copy of the answer must be filed with the against you for the relief demanded in the complaint has a summary of the relief demanded in the relief deman	n served upon you within 3 e court either before or wit	0 days after service	of this summons and c	omplaint upon you, exclu	sive of the day of service.
CERTIFIED ATR	RUE COPY wans III (D.C.)	NOTICE	/	Charles D. Susano III.	Clerk (
Tennessee law provides a Ten Thousand do entered against you in this action and you the clerk of the court The list may be filed final, it will not be effective as to any executo be listed; these include items of necessar portraits, the family bible, and school book exemption right or how to exercise it, you	wish to claim property as e at any time and may be cha tion or garnishment issued y wearing apparel for your s. Should any of these item	exempt, you must file anged by you thereal I prior to the filing of self and your family as be seized you wou	e a written list, under o fter as necessary; howe of the list. Certain item: and trunks or other re	path, of the items you wislever, unless it is filed befor s are automatically exemp sceptacles necessary to con	n to claim as exempt with the the judgment becomes of by law and do not need ntain such apparel, family
	SER	VICE INFORM	ATION		
To the process server: Defendant:	BRYANSIEJEDA 394LSW-154th Ct Miami-FL-33185	3			
can be served at:	TENNESSEE SECR Istell, State Capito Nashville, FN 3724	l, 600 Charlotte	TE	as agent for Service	for a Non-Resident
		RETURN	•	FOR ASSIST	
I received this summons on the	day of		٠ ,	865 / 21	
I hereby certify and return that on the	ne day of		I:	Elizabeth.Golen	n@knoxcounty.org
[] served this summons and compl	aint on the defendant		in the following m	anner:	
[] failed to serve this summons wit	hin 90 days after its is	suance because:			
Process Server Print No	ame A	ddress		Phone Num	ber

ATS

STATE OF TENNESSEE THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

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STEVEN WOOTEN,)	<u>.</u>
Plaintiff, vs.)	Civil Action No2-102-22
BRYAN TEJEDA, A & M TRAN and FEDEX CORPORATION, Defendants.	SPORTATION SERVICE GR	.OUP, INC.,))	HARLES DE SUN
To the above named defendant (s):			NESS CERES
3792I an answer to the complaint herewith	n served upon you within 30 days after e court either before or within a reason complaint.	service of this summo	nose address is 2125 Middlebrook Pike, Knowille, TN ons and complaint upon you, exclusive of the day of service. If you fail to do so, judgment by default can be taken Charles D. Süsanö III, Clerk
			Deputy Clerk
To the defendant (s):	NOT	TICE	
the clerk of the court. The list may be filed final, it will not be effective as to any execu to be listed; these include items of necessar	at any time and may be changed by you tion or garnishment issued prior to the ty wearing apparel for yourself and you ts. Should any of these items be seized may wish to seek counsel of a lawyer.	u thereafter as necessa e filing of the list. Cert or family and trunks or you would have the ri	it, under oath, of the items you wish to claim as exempt with ary; however, unless it is filed before the judgment becomes tain items are automatically exempt by law and do not need r other receptacles necessary to contain such apparel, family ght to recover them. If you do not understand your
	SERVICE INI	FORMATION	
To the process server: Defendant:	FEDEX CORPORATION (TO BE SERVED BY PLAINTIFF	S COUNSEL)	
can be served at:	FedEx Corporation c/o C.T. Corporation System, 300 Montvue Rd. Knoxville, TN 37919-5546	Registered Agen	ıt
	RET	URN .	A 77 A
I received this summons on the	_day of,,	·	ADA COLCOCTANCE CALL
I hereby certify and return that on t			865 / 215-3641
[] served this summons and compl	aint on the defendant	in the follo	owing about Golem@knoxcounty.org
[] failed to serve this summons wi	thin 90 days after its issuance be	cause:	 -
Process Server Print N	ame Address		Phone Number

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	SUMMO	NS Mon	2 pm " " " " 111
STEVEN WOOTEN, Plaintiff, vs.	,	AND GIVIL SEES)	102-77 WOWS NO 2-102-27
BRYAN TEJEDA, A & M TRANSPORTATIO and FEDEX CORPORATION, Defendants.	N SERVICE GROUP,) INC.,))	~~~~ ~~ ~~ ~~ ~~ ~~ ~~ ~~ ~~ ~~ ~~ ~~ ~
To the above named defendant (s):		·	
You are hereby summoned and required to serve upon T. Sec 37921 an answer to the complaint herewith served upon you A copy of the answer must be filed with the court either before against you for the relief demanded in the complaint.	within 30 days after service ore or within a reasonable tin	of this summons and complaint	upon you, exclusive of the day of service.
Issued and attested this the 12 day of 4	oul, 2022	Charles Deputy	D. Susano III. Clerk
To the defendant (s):	NOTICE		
Tennessee law provides a Ten Thousand dollar (\$10,000) per entered against you in this action and you wish to claim proper the clerk of the court. The list may be filed at any time and in final, it will not be effective as to any execution or garnishme to be listed; these include items of necessary wearing appare portraits, the family bible, and school books. Should any of the exemption right or how to exercise it, you may wish to seek	perty as exempt, you must fil hay be changed by you therea ent issued prior to the filing o I for yourself and your family hese items be seized you wou	e a written list, under oath, of th fter as necessary; however, unles of the list. Certain items are auto: and trunks or other receptacles	ne items you wish to claim as exemps with sight is filed before, the judgment becomes matically exempt by law and do not need necessary to contain such apparel, family
	SERVICE INFORM	IATION	
To the process server: Defendant: USAAAGASL	JALTY-INSURANCE C RRIER)*(NAIC CôCode: 25	COMPANY (1968)	ADA
can be served at: USAA-Casur (lo)Gommis 500 James R Nashville, 17	Charles Line		FOR ASSISTANCE CALL 865 / 215-3641 beth.Golem@knoxcounty.org
	RETURN		
I received this summons on the day of			
I hereby certify and return that on the day of			
[] served this summons and complaint on the def	endant	_in the following manner:	
[] failed to serve this summons within 90 days aft	er its issuance because:		
Process Server Print Name	Address		Phone Number